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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$19,980.00 IN
U.S. CURRENCY,

15 APPROXIMATELY \$15,000.00 IN
16 U.S. CURRENCY, AND

17 APPROXIMATELY \$4,335.00 IN
18 U.S. CURRENCY,

19 Defendant.

2:21-MC-00213-MCE-CKD

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

20 It is hereby stipulated by and between the United States of America and potential claimant Jason
21 Brewer ("claimant"), by and through their respective counsel, as follows:

22 1. On or about June 4, 2021, claimant filed a claim in the administrative forfeiture proceeding
23 with the United States Postal Inspection Service ("USPIS") with respect to the Approximately \$19,980.00
24 in U.S. Currency, Approximately \$15,000.00 in U.S. Currency and Approximately \$4,335.00 in U.S.
25 Currency (hereafter "defendant currency"), which were seized on March 17, 2021.

26 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §
27 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the

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1 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim
2 to the defendant currency as required by law in the administrative forfeiture proceeding.

3 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
4 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency
5 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
6 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
7 That deadline was September 2, 2021.

8 4. By Stipulation and Order filed September 1, 2021, the parties stipulated to extend to October
9 1, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
10 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
11 forfeiture.

12 5. By Stipulation and Order filed October 1, 2021, the parties stipulated to extend to November
13 1, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
14 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
15 forfeiture.

16 6. By Stipulation and Order filed November 1, 2021, the parties stipulated to extend to
17 December 1, 2021, the time in which the United States is required to file a civil complaint for forfeiture
18 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject
19 to forfeiture.

20 7. By Stipulation and Order filed November 30, 2021, the parties stipulated to extend to
21 January 31, 2022, the time in which the United States is required to file a civil complaint for forfeiture
22 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject
23 to forfeiture.

24 8. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to April
25 1, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
26 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
27 forfeiture.

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1 9. Accordingly, the parties agree that the deadline by which the United States shall be required
2 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that
3 the defendant currency is subject to forfeiture shall be extended to April 1, 2022.

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5 Dated: 1/27/22

PHILLIP A. TALBERT
United States Attorney


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7 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant United States Attorney

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9 Dated: 1/27/22

10 /s/ Valery Nechay
VALERY NECHAY
Attorney for potential claimant
Jason Brewer
(Signature authorized by email)

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14 IT IS SO ORDERED.

15 Dated: February 3, 2022

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MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE